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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 AVELARDO RIVERA and YASMINE  
12 ROMERO, individually and on behalf of all  
13 others similarly situated,

14 Plaintiffs,

15 v.

16 AMAZON WEB SERVICES, INC.,

17 Defendant.  
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Case No. 2:22-cv-00269-JHC

STIPULATED AND UNOPPOSED  
MOTION AND ORDER TO MODIFY  
DEADLINES

Pursuant to Local Civil Rule 7(d)(1), Local Civil Rule 10(g), and the Court's August 16, 2024 order modifying deadlines, *see* Dkt. 206, Plaintiffs Avelardo Rivera and Yasmine Romero ("Plaintiffs") move the Court for a three (3) week extension of the current expert discovery and class certification deadlines. Defendant Amazon Web Services, Inc. ("AWS") does not oppose Plaintiffs' requested relief.

In support of this Stipulated Motion, Plaintiffs state as follows:

1. On August 16, 2024, Plaintiffs and AWS (the "Parties") filed a joint stipulated motion to modify the schedule in this case, which the Court granted. *See* Dkt. 206 (the "Order").
2. On December 13, 2024, consistent with the Court's Order, AWS served on Plaintiffs five expert reports regarding class certification issues, each of which outline different distinct issues raised in this litigation.
3. To facilitate Plaintiffs' ability to fully respond to AWS's expert reports, and due to deadlines of both Plaintiffs' counsel and Plaintiffs' experts, Plaintiffs respectfully request that the current case schedule be modified as follows, extending each deadline by three (3) weeks:

Event	Current Deadline	Proposed Deadline
Plaintiffs' rebuttal expert disclosures regarding class certification issues	February 11, 2025	March 4, 2025
Completion of expert discovery regarding class certification issues	March 31, 2025	April 21, 2025
Parties' deadline to file <i>Daubert</i> motions regarding class certification experts	May 15, 2025	June 5, 2025

Plaintiffs' deadline to file motion for class certification	May 15, 2025	June 5, 2025
AWS's deadline to respond to motion for class certification	June 26, 2025	July 17, 2025
Plaintiffs' deadline to reply in support of class certification	July 24, 2025	August 14, 2025
Parties' deadline to file joint status report to propose post-class certification deadlines	Fourteen (14) days after Court's ruling on motion for class certification	Fourteen (14) days after Court's ruling on motion for class certification

WHEREFORE, Plaintiffs respectfully request that the Court enter an order modifying the current case deadlines in accordance with this Stipulated Motion.

Respectfully submitted,

Dated: February 7, 2025

**AVELARDO RIVERA and YASMINE ROMERO**, individually and on behalf of all others similarly situated,

By: /s/ Wright A. Noel  
One of Plaintiffs' Attorneys

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*\*Admitted pro hac vice*

*Attorneys for Plaintiffs and the Putative Class*

**ORDER**

**IT IS SO ORDERED.**

DATED this 10th day of February, 2025.

A handwritten signature in cursive script, reading "John H. Chun", written in black ink.

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JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE